

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA)
)
)
 V.)
)
)
 CARLI HOLLAND)

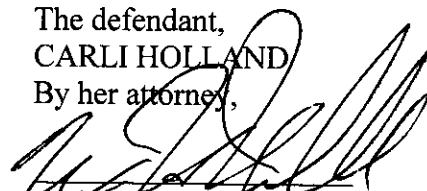
Criminal No. 1:04-cr-10229-MLW-ALL
U.S. DISTRICT COURT
DISTRICT OF MASS.

MOTION TO REMOVE CURFEW AS A TERM AND
CONDITION OF RELEASE

Now Comes the defendant, Carli Holland , and moves that this Honorable Court remove as a term and condition of release that she submit to a curfew. This condition was addressed at her initial appearance and it was represented to the Court that if Ms. Holland met the terms and conditions of her pre-trial release that the Government would assent to its removal. The defendant has met the conditions of her release.

In support of this motion the defendant states that this motion is assented to by both the AUSA John Wortman and the defendant's Pre-Trial Services Officer Joshua Ulrich.

The defendant,
CARLI HOLLAND
By her attorney,


Walter H. Underhill, Esq.
66 Long Wharf
Boston, MA
02110
4th. Floor
Tel. # 617-523-5858
B.B.O. # 506300

CERTIFICATE OF SERVICE

I , Walter H. Underhill, Esquire, hereby certify that I have served a copy of this pleading upon the United States Attorney's Office and Pre Trial Services by hand on November 1, 2004.

SIGNED: 

DATE: 11/01/04

RULE 7.1 CERTIFICATION

The parties have had an opportunity to confer on this motion and the motion is assented to by the attorney for the Government, John Wortman, Esquire.

SIGNED: _____

DATE: _____

[Handwritten signature]
11/01/04